

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
JAEMIKA JONES	:	VIOLATIONS:
	:	18 U.S.C. § 371 (conspiracy – 1 count)
	:	18 U.S.C. § 924(a)(1)(A) (false statements to a federal firearms licensee – 2 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Heritage Guild, located at 70 Hilton Street, Easton, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.
2. Bear’s Gun Room, located at 1546 St Rt 315, Wilkes-Barre, Pennsylvania, possessed an FFL and was authorized to deal in firearms under federal laws.
3. Pocono Mountain Firearms, located at 2551 Route 611 Suite 2, Scotrun, Pennsylvania, possessed an FFL and was authorized to deal in firearms under federal laws.
5. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title

18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.

6. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473 ("Form 4473"). Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. Question 11(a) of Form 4473 requires that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she is the actual buyer of the firearm. The Form 4473 contains language warning that **"You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you."** In the certification section of the Form 4473, the actual buyer must certify that his or her answers to the questions on the form are "true, correct, and complete," and acknowledge by his or her signature that "making any false oral or written statement . . . is a crime punishable as a felony under Federal law, and may also violate State and/or local law."

7. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer's home address and date of birth, to ensure that the person was not prohibited from possessing a firearm.

8. From in or about October 2021 through in or about March, 2024, in the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the District of New Jersey and elsewhere, defendant

JAEMIKA JONES,

conspired and agreed with Lanyyia Hopson, charged elsewhere, and with others known and unknown to the grand jury, to commit offenses against the United States, that is, to make false statements with respect to the information required to be kept in the records of a federally licensed firearms dealer, in violation of Title 18, United States Code, Section 924(a)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

9. Defendant JAEMIKA JONES paid Lanyyia Hopson to purchase firearms from federally licensed firearms dealers in Pennsylvania.

10. Defendant JAEMIKA JONES instructed Lanyyia Hopson which firearms to purchase from federally licensed firearms dealers in Pennsylvania.

11. Defendant JAEMIKA JONES and Lanyyia Hopson travelled together from Newark, New Jersey to federally licensed firearms dealers in Pennsylvania to purchase firearms, knowing that the firearms were to be transported to New Jersey for distribution.

12. Defendant JAEMIKA JONES encouraged Lanyyia Hopson to use Hopson's Pennsylvania driver's license and falsely state on the Form 4473 for each firearm purchase that she was the actual purchaser of the firearms, when in fact they knew each statement was false and they intended to give the firearms to individuals in New Jersey.

13. Defendant JAEMIKA JONES and Lanyyia Hopson transported firearms from Pennsylvania to New Jersey and distributed them to individuals who were prohibited by federal law from possessing firearms.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the District of New Jersey and elsewhere:

1. On or about October 30, 2021, defendant JAEMIKA JONES recruited Lanyyia Hopson to purchase firearms in Pennsylvania from a FFL for defendant JONES and Person #1, a person known to the grand jury.

2. On or about October 30, 2021, defendant JAEMIKA JONES and Lanyyia Hopson selected Pocono Mountain Firearms as a firearm purchase location and travelled together to that store to purchase firearms for defendant JAEMIKA JONES and Person #1. Defendant JONES provided Lanyyia Hopson with money to make the firearm purchase.

3. On or about October 30, 2021, defendant JAEMIKA JONES and Lanyyia Hopson entered Pocono Mountain Firearms, and selected a Smith & Wesson SD9VE 9mm semi-automatic pistol, bearing serial number FDR5736, and a Smith & Wesson MP 9 Shield Plus 9mm semi-automatic pistol, bearing serial number JMW0026. Lanyyia Hopson provided a Pennsylvania driver's license for identification and completed a Form 4473. The Form 4473 contains the following language in bold type: Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you." Lanyyia Hopson indicated that she was the actual buyer

and signed the certification section of the Form 4473 certifying that her answers were true, correct, and complete.

4. On or about October 3, 2021, defendant JAEMIKA JONES and Lanyyia Hopson left Pocono Mountain Firearms, and travelled together back to Newark, New Jersey. Defendant JONES took possession of the firearms from Lanyyia Hopson.

5. On or about March 26, 2022, defendant JAEMIKA JONES recruited Lanyyia Hopson to purchase a firearm in Pennsylvania from a FFL for defendant JONES and Person #1. Defendant JONES gave Lanyia Hopson money to purchase the firearms.

6. On or about March 26, 2022, defendant JAEMIKA JONES and Lanyyia Hopson selected Pocono Mountain Firearms, located in Scotrun, Pennsylvania, and travelled together to that store to purchase firearms for defendant JAEMIKA JONES and Person #1.

7. On or about March 26, 2022, defendant JAEMIKA JONES and Lanyyia Hopson entered Pocono Mountain Firearms, and selected a SARSILMAZ Model SAR109T 9mm semi-automatic pistol, bearing serial number T1102-21BG00196. Lanyyia Hopson provided a Pennsylvania driver's license for identification and completed a Form 4473. The Form 4473 contains the following language in bold type: Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you." Lanyyia Hopson indicated that she was the actual buyer and signed the certification section of the Form 4473 certifying that her answers were true, correct, and complete.

8. On or about March 26, 2022, defendant JAEMIKA JONES and Lanyyia Hopson left Pocono Mountain Firearms, and travelled together back to Newark, New Jersey. Defendant JAEMIKA JONES took possession of the firearm from Lanyyia Hopson.

9. On or about November 12, 2022, defendant JAEMIKA JONES recruited Lanyyia Hopson to purchase firearms in Pennsylvania from an FFL for defendant JONES and Person #1. Defendant JONES gave Lanyyia Hopson money to purchase the firearms.

10. On or about November 12, 2022, defendant JAEMIKA JONES and Lanyyia Hopson selected Bear's Gun Room and travelled together to that store to purchase firearms for defendant JONES and Person #1.

11. On or about November 12, 2022, defendant JAEMIKA JONES and Lanyyia Hopson entered Bear's Gun Room, and selected a Glock 19 9mm semi-automatic pistol bearing serial number BWRY822, a Glock 22 .40 caliber semi-automatic pistol bearing serial number BXZW540, and a Glock 21 .45 caliber semi-automatic pistol bearing serial number AFDZ013. Lanyyia Hopson provided a Pennsylvania driver's license for identification and completed a Form 4473. The Form 4473 contains the following language in bold type: Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you." Lanyyia Hopson indicated that she was the actual buyer and signed the certification section of the Form 4473 certifying that her answers were true, correct, and complete.

12. On or about November 12, 2022, defendant JAEMIKA JONES and Lanyyia Hopson left Bear's Gun Room, and travelled together back to Newark, New Jersey. Lanyyia Hopson gave the firearms to defendant JONES, and Person #1.

13. On or about March 7, 2023, defendant JAEMIKA JONES recruited Lanyyia Hopson, charged elsewhere, to purchase firearms in Pennsylvania from an FFL for defendant JONES, Person #2, a person known to the grand jury, and others unknown to the grand jury. Defendant JONES gave Lanyyia Hopson money to purchase the firearms.

14. On or about March 7, 2023, defendant JAEMIKA JONES and Lanyyia Hopson, charged elsewhere, selected Heritage Guild and travelled together to that store to purchase firearms for defendant JONES, Person #2, a person known to the grand jury, and others unknown to the grand jury.

15. On or about March 7, 2023, Person #2 provided Lanyyia Hopson with two cash payments to pay for the firearm purchases.

16. On or about March 7, 2023, defendant JAEMIKA JONES and Lanyyia Hopson entered Heritage Guild, and selected a Smith & Wesson Shield Plus 9mm semi-automatic pistol bearing serial number JPX3694, a Smith & Wesson PC Shield M2.0 EZ380 .380 caliber semi-automatic pistol bearing serial number RHS4857, and a Springfield Armory XD45 .45 caliber semi-automatic pistol bearing serial number XD603570. Lanyyia Hopson provided a Pennsylvania driver's license for identification and completed a Form 4473. The Form 4473 contains the following language in bold type: Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you." Lanyyia Hopson indicated that she was the actual buyer and signed the certification section of the Form 4473 certifying that her answers were true, correct, and complete.

17. On or about March 7, 2023, defendant JAEMIKA JONES and Lanyyia Hopson, charged elsewhere, left Heritage Guild, and travelled together back to Newark, New Jersey. Lanyyia Hopson gave the firearms to defendant JONES, Person #2, and others unknown to the grand jury.

18. On or about March 7, 2024, defendant JAEMIKA JONES travelled with

Lanyyia Hopson to purchase firearms in Pennsylvania from an FFL for defendant JONES, Person #2, and others unknown to the grand jury.

19. On or about March 7, 2024, defendant JAEMIKA JONES told Lanyyia Hopson, charged elsewhere, to select two "XD9's" a "4-5", or a "40". Defendant JONES told Lanyyia Hopson that she wanted two firearms for herself, and one for her cousin. Defendant JONES also told Lanyyia Hopson that she wanted to get Person #2 a firearm as well. Defendant JONES and Lanyyia Hopson selected Heritage Guild, and travelled together to that store to purchase firearms for defendant J JONES, Person #2, and others unknown to the grand jury. Defendant JONES provided Lanyyia Hopson with a Visa credit card to purchase the firearms.

20. On or about March 7, 2024, defendant JAEMIKA JONES and Lanyyia Hopson entered Heritage Guild, and selected a Taurus model G2C, 9mm semi-automatic pistol, bearing serial number AEJ733998, a Taurus model Judge, 410/.45 caliber colt revolver, bearing serial number AE1831875, and a Springfield model Hellcat, 9mm semi-automatic pistol, bearing serial number BF108714. Lanyyia Hopson provided a Pennsylvania driver's license for identification and completed a Form 4473. The Form 4473 contains the following language in bold type: Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you." Lanyyia Hopson indicated that she was the actual buyer and signed the certification section of the Form 4473 certifying that her answers were true, correct, and complete.

21. On or about March 25, 2024, defendant JAEMIKA JONES and Lanyyia Hopson travelled together from Newark, New Jersey, to Heritage Guild to take possession of the firearms purchased on March 7, ~~2024~~ 2024. RWS 6/27/24

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO AND THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 13 and Overt Acts 1 through 21 of Count One are incorporated here.

2. On or about the dates below, each constituting a separate offense, in Northampton County, in the Eastern District of Pennsylvania, defendant

JAEMIKA JONES,

in connection with the acquisition of each of the firearms listed below from the FFL holders listed below, knowingly aided and abetted and willfully caused the making of false statements and representations with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holders' records, in that, at the direction of the defendant JONES, Lanyyia Hopson, charged elsewhere, falsely certified on the Form 4473, Firearms Transaction Record, that she, Lanyyia Hopson, was the actual buyer of the firearms, when in fact defendant JONES and Lanyyia Hopson knew this statement was false and fictitious, in that they knew Lanyyia Hopson was actually purchasing the firearms for defendant JONES and others, each falsely certified form constituting a separate count of this Indictment:

Count	Date	FFL (Location)	Firearm(s)	Serial Number
Two	March 7, 2023	Heritage Guild (Easton, PA)	<ul style="list-style-type: none"> • Smith & Wesson PC Shield Plus 9mm semi-automatic pistol • Smith & Wesson PC Shield M2.0 EZ380 .380 caliber semi-automatic pistol • Springfield Armory XD45 .45 caliber semi-automatic pistol 	JPX3694 RHS4857 XD603570
Three	March 7, 2024	Heritage Guild (Easton, PA)	<ul style="list-style-type: none"> • Taurus G3C, 9mm semi-automatic pistol • Taurus Judge, .410/.45 caliber semi-automatic pistol • Springfield Hellcat, 9mm semi-automatic pistol 	AEJ733998 AE183187 5 BF108714

All in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 924(a)(1)(A), set forth in this indictment, defendant

JAEMIKA JONES

shall forfeit to the United States of America, the firearms involved in the commission of these offenses, including, but not limited to:

1. a Smith & Wesson, PC Shield Plus, 9mm semi-automatic pistol, bearing serial number JPX3694;
2. a Smith & Wesson, PC Shield M2.0 EZ380, .380 caliber semi-automatic pistol, bearing serial number RHS4857;
3. a Springfield Armory, XD45, .45 semi-automatic caliber pistol, bearing serial number XD603570;
4. a Glock, model 19, 9mm semi-automatic pistol, bearing serial number BWRY822;
5. a Glock, model 22, .40 caliber semi-automatic pistol, bearing serial number BXZW540;
6. a Glock, model 21, .45 caliber semi-automatic pistol, bearing serial number AFDZ013;
7. a Smith & Wesson, MP 9 Shield Plus, 9mm semi-automatic pistol, bearing serial number RHK2975;
8. a Smith & Wesson, SD9VE, 9mm semi-automatic pistol, bearing serial number FDR5736;
9. a Smith & Wesson, MP 9 Shield Plus, 9mm semi-automatic pistol, bearing JMW0026; and
10. a SAR ARMS, 9mm semi-automatic pistol, bearing serial number T110221BG00196.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States

Code, Section 924(d).



A handwritten signature in blue ink, appearing to read "JCR" followed by a flourish and the word "for".

JACQUELINE C. ROMERO
United States Attorney

No. 24-

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania
Criminal Division

THE UNITED STATES OF AMERICA

VS.

JAEMIKA JONES

INDICTMENT

Counts

18 U.S.C. § 371 (conspiracy – 1 count)
18 U.S.C. § 924(a)(1)(A) (false statements
to a federal firearms licensee – 2 counts)
18 U.S.C. § 2 (aiding and abetting)

Notice of forfeiture



Filed in open court this 27th day,
Of June A.D. 20 24

